UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

WESTERN DIVISION

CIVIL ACTION NO. 3:05-CV-30109-MAP

JOANN PELLETIER, Plaintiff

VS.

CHITRA PUBLICATIONS and SANDRA T. TALBOT,
Defendants

PLAINTIFF'S MOTION TO AMEND COMPLAINT

Now comes the Plaintiff, JoAnn Pelletier ("Ms. Pelletier"), and respectfully requests that this Honorable Court permit her to file and serve the attached Amended Complaint for Injunctive Relief and Damages in compliance with Federal Rules of Civil Procedure 15(a). In support thereof, Ms. Pelletier states that her original Complaint was filed on or about May 4, 2005, alleging copyright infringement as to Defendant Sandra Talbot (Count I), copyright infringement as to Defendant, Chitra Publications (Count II) false designation of origin as to Defendant Sandra Talbot (Count III), false designation of origin as to Defendant Chitra Publications (Count IV), unfair competition pursuant to Massachusetts General Laws, Chapter 93A as to Defendant, Sandra Talbot (Count V), and unfair competition pursuant to M.G.L., Chapter 93A as to Defendant Chitra Publications (Count VI).

The Defendant Talbot filed an Answer to the Plaintiff's Complaint on October 12, 2005, participated in a scheduling conference on February 9, 2006, and filed her initial disclosure pursuant to Fed.R.Civ.P. 26 on February 21, 2006. To date, the Defendant, Chitra Publications,

has ignored the Plaintiff by failing to answer the original complaint, causing a default to be entered by this Court on October 13, 2005.

Federal Rules of Civil Procedure 15(a) states, in pertinent part:

"A party may amend the party's pleading once as a matter of course at any time before a responsive pleading is served..."

The Plaintiff's Amended Complaint seeks to add Counts against Chitra Publications, Chitra's General Partner, Chariot Publishing, Inc., Chariot's officer, Christiane Meunier, Chitra's owner, Christiane Meunier, and Christiane Meunier d/b/a Moon Over Mountain. The Amended Complaint does not seek to add any counts against Sandra T. Talbot, who has answered the original complaint.

Accordingly, Ms. Pelletier should be permitted to amend her original complaint "as a matter of course" and to serve the complaint on all defendants named in the Amended Complaint.

WHEREFORE, the Plaintiff hereby moves to amend her original complaint and to serve the same upon all defendants.

DATED: February 24, 2006

THE PLAINTIFF BY HER ATTORNEY,

/s/ Claire L. Thompson

I certify that this document has been served upon all counsel of record in compliance with F.R.C.P. on February 24, 2006

/s/ Claire L. Thompson

Claire L. Thompson, Esq.

Claire L. Thompson, Esquire Doherty, Wallace, Pillsbury & Murphy, P.C. One Monarch Place, Suite 1900 Springfield, MA 01144-1900

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UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

WESTERN DIVISION

CIVIL ACTION NO. 3:05-CV-30109-MAP

JOANN PELLETIER, Plaintiff

VS.

SANDRA T. TALBOT, CHITRA
PUBLICATIONS, CHARIOT PUBLISHING,
INC. As General Partner of Chitra
Publications, CHRISTIANE MEUNIER, As
Officer of Chariot Publishing, Inc.,
CHRISTIANE MEUNIER, As Owner of
Chitra Publications, and CHRISTIANE
MEUNIER d/b/a MOON OVER MOUNTAIN,
Defendants

AMENDED COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

JURISDICTION AND VENUE

- 1. This is an action for injunctive relief and money damages alleging copyright infringement under the United States Copyright Act of 1976, as amended, 17 U.S.C. §§ 101 et seq. (the "Copyright Act"), and further alleging false designations of origin under the Lanham Act § 43(a), 15 U.S.C. § 1125(a) and unfair competition under Massachusetts General Law, Chapter 93A. This Court has jurisdiction pursuant to 28 U.S.C. § 1338(a). Supplemental jurisdiction over the cause of action under the laws of the Commonwealth of Massachusetts is proper as substantially related to those causes of action over which the court has original jurisdiction, pursuant to 28 U.S.C. § 1367.
- 2. This Court has personal jurisdiction over Defendant Sandra T. Talbot because Defendant Talbot resides in Massachusetts, and over Defendants Chitra Publications, Chariot Publishing, Inc. as General Partner of Chitra Publications, Christiane Meunier, as Officer of Chariot Publishing, Inc., owner of Chitra Publications, and doing business as Moon Over Mountain because Defendants Chitra, Chariot, and Meunier conduct business in the

Commonwealth of Massachusetts and within the First Circuit of Massachusetts by advertising and selling their products through the Internet to Massachusetts residents.

- 3. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and 1400(a).
- 4. All of the claims for copyright infringement joined in this Complaint are governed by the same legal rules and involve similar facts and parties. Joinder of the claims will promote the convenient administration of justice and will avoid a multiplicity of separate similar actions against the Defendants.

THE PARTIES

- 5. Plaintiff JoAnn Pelletier ("Plaintiff Pelletier"), an individual having a primary residence of 41 Woolworth Street, Longmeadow, Massachusetts 01106, is the author and owner of copyrights in the design and in the pattern of a quilt.
- Defendant Sandra T. Talbot ("Defendant Talbot") is an individual having a primary residence of 15 Prynnwood Road, Longmeadow, Massachusetts 01106.
- 7. Defendant Chitra Publications ("Defendant Chitra") is a corporation, organized and existing under the laws of the Commonwealth of Pennsylvania, and having a usual place of business at 2 Public Avenue, Montrose, Pennsylvania 18801-1220, which publishes and sells magazines and books dedicated to quilting, wherein such publications include pictures of quilt designs and instructions for creating the pictured quilt designs, and further wherein such publications are offered for sale and sold over the Internet and in retail stores throughout the United States.
- 8. Defendant Chariot Publishing, Inc. ("Defendant Chariot") is the General Partner of Chitra Publications, a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and having a usual place of business at 2 Public Avenue, Montrose, Pennsylvania 18801-1220.
- 9. Defendant, Christiane (Abdale) Meunier, ("Defendant Meunier") is an officer of Chariot Publishing, Inc., the General Partner of Chitra Publications, a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and having a usual place of business at 2 Public Avenue, Montrose, Pennsylvania 18801-1220.

- 10. The Defendant Meunier is also owner of Chitra Publications, Commonwealth of Pennsylvania entity number 956722 (fictitious names), a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, now or formerly of 272 Main Street, New Milford, Pennsylvania 18834, which published and sold magazines dedicated to quilting, wherein such publications included pictures of quilt designs and instructions for creating the pictured quilt designs, and further wherein such publications were offered for sale and sold over the Internet and/or in retail stores throughout the United States.
- 11. The Defendant Meunier also does business as Moon Over Mountain, having a usual place of business at 2 Public Avenue, Montrose, Pennsylvania 18801-1220, which publishes and sells magazines and books dedicated to quilting, wherein such publications include pictures of quilt designs and instructions for creating the pictured quilt designs and further wherein such publications are offered for sale and sold over the Internet and in retail stores throughout the United States.

COUNT I – COPYRIGHT INFRINGEMENT AS TO DEFENDANT SANDRA T. TALBOT

- 12. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-11 above.
- 13. On or about January 21, 1993, Plaintiff Pelletier first published an original work of authorship consisting of a unique quilt design (the "Copyrighted Design") and a pattern for recreating the design (the "Copyrighted Pattern"), a copy of which are attached hereto as Exhibit A.
- 14. The Copyrighted Design is a unique and original design derived from a log cabin, courthouse quilt design.
- 15. On September 17, 2004, Plaintiff Pelletier complied in all respects with the requirements of the Copyright Act, and applied for and received from the Register of Copyrights Certificate of Registration No. VA 1-282-126, which is attached hereto as Exhibit B, for the Copyrighted Design and for the Copyrighted Pattern ("Registered Copyright").
- 16. On or about January 21, 1993, Plaintiff Pelletier conducted a quilting class, which was attended by Defendant Talbot and at which Plaintiff Pelletier provided Defendant Talbot with visual and written instructions for the Copyrighted Design and for the Copyrighted Pattern.

- 17. On or about April 2000, Plaintiff Pelletier conducted a quilting class (the "Class"), which was attended by Defendant Talbot. During the course of the Class, Plaintiff Pelletier read a letter and presented a copy of the letter to Defendant Talbot, wherein the letter stated that any quilts expressly or derivatively reproduced from all teachings of Plaintiff Pelletier, including the Copyrighted Pattern, was for Defendant Talbot's own personal use and enjoyment, and was not for public display or publication. See Exhibit C.
- 18. On or about April to September 2000, Defendant Talbot threatened to submit the Copyrighted Pattern and the Copyrighted Design to Defendant Chitra Publications ("Defendant Chitra"); consequently, in September, 2000 Plaintiff Pelletier requested that Defendant Talbot no longer attend the Class.
- 19. Claiming the Copyrighted Pattern and Copyrighted Design to be the direct result of her own creative endeavor and, hence, belonging exclusively to her, on or about September 2000, Defendant Talbot submitted the Copyrighted Design under the title "Just Spooling Around" to Defendant Chitra, and gave Defendant Chitra permission to publish the Copyrighted Design in Defendant Chitra's various quilting publications, wherein such publications accredited Defendant Talbot with authorship and ownership status over the Copyrighted Design.
- 20. On September 21, 2004, Attorney Deborah A. Basile, an attorney at Doherty, Wallace, Pillsbury & Murphy, P.C., located at One Monarch Place, Suite 1900, 1414 Main Street, Springfield, MA 01144, working on behalf of Plaintiff Pelletier ("Attorney Basile"), sent a cease and desist letter to Defendant Talbot, which is attached hereto as Exhibit D.
- 21. By virtue of the unauthorized use, reproduction, and distribution of the Copyrighted Design, Defendant Talbot has infringed Plaintiff Pelletier's Copyrighted Design all in violation of Title 17 of the United States Code.
- 22. The specific acts of copyright infringement alleged above, as well as, Defendant Talbot's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Talbot from committing further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

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COUNT II – COPYRIGHT INFRINGEMENT AS TO DEFENDANT CHITRA PUBLICATIONS

- 23. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-22 above.
- 24. On or about October 2003, without Plaintiff Pelletier's permission, Defendant Chitra published the Copyrighted Design under the title "Just Spooling Around" along with the Copyrighted Pattern in the October/November 2003 issue of Defendant Chitra's "Quiltworks Today" magazine (the "Magazine"), wherein the Copyrighted Design and the Copyrighted Pattern appeared on pages 26-27 of the Magazine. Exhibit E.
- 25. On or about 2004, Defendant Chitra published the Copyrighted Design under the title "Just Spooling Around" and the Copyrighted Pattern in a softcover work entitled "A Few of My Favorite Scrap Quilts" (the "Book"). Exhibit F.
- 26. The Copyrighted Design is featured on the cover of the Book, on page 3 of the Book and the Copyrighted Pattern is duplicated in the Book at Pages 11 and 15; additionally, credit of authorship is improperly given to Defendant Talbot on Page 15 of the Book. Exhibit F.
- 27. On or about September 2004, Plaintiff Pelletier phoned Defendant Chitra and indicated to an agent of Defendant Chitra that Plaintiff Pelletier was in fact the author and the owner of the Copyrighted Design and the Copyrighted Pattern, and that she desired to have Defendant Talbot discredited from any claims of authorship in the Copyrighted Design and the Copyrighted Pattern and that she wanted her name to be credited to the Copyrighted Design and Pattern.
- 28. On September 21, 2004, Attorney Basile sent a cease and desist letter to Defendant Chitra, which is attached hereto as Exhibit D.
- 29. Defendant Chitra has offered for sale and has sold the Magazine and the Book over the Internet and in retail stores located throughout the United States.
- 30. As of February 17, 2006, Defendant Chitra, without Plaintiff Pelletier's permission, continues to publish, advertise, and to sell the Book and the magazine for profit as evidenced by the following Web sites, which were last accessed on February 17, 2006: http://www.bestwebbury.com/A_Few_of_My_Favorite_Scrap_Quilts; http://www.quiltersgilde.nl/Bieb/2005MrtNwB.html; and

http://www.quilttownusa.com/eshop/10browse.asp?category=Back+Issue See Exhibit G.

- 31. By virtue of the unauthorized use, reproduction, and distribution of the Copyrighted Design and the Copyrighted Pattern, Defendant Chitra has infringed Plaintiff Pelletier's Copyrighted Design and Copyrighted Pattern all in violation of Title 17 of the United States Code.
- 32. The specific acts of copyright infringement alleged above, as well as, Defendant Chitra's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Chitra from committing further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT III –CONTRIBUTORY LIABILITY AS TO DEFENDANT CHITRA PUBLICATIONS

- 33. Plaintiff Pelletier repeats and realleges each of the allegations contained in Paragraphs 1 through 32 above.
- 34. The Defendant Chitra, with knowledge of the infringing activity of the Defendant Talbot, induced, caused, or materially contributed to the infringing conduct of the Defendant Talbot, or otherwise aided or facilitated the infringement with reason to know of the direct infringement.
- 35. The specific acts and/or contributory conduct of the Defendant Chitra as alleged above have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Chitra from committing or contributing to any further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

<u>COUNT IV – COPYRIGHT INFRINGEMENT AS TO</u> <u>DEFENDANT CHARIOT PUBLISHING, INC.</u>

- 36. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-35 above.
- 37. The Defendant Chariot is the General Partner of the limited partnership Chitra Publications.

- 38. By virtue of the unauthorized use, reproduction, and distribution of the copyrighted design and the copyrighted pattern, Defendant Chariot has infringed Plaintiff Pelletier's copyrighted design and copyrighted pattern all in violation of Title 17 of the United States Code.
- 39. The specific acts of copyright infringement alleged above, as well as Defendant Chariot's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Chariot from committing further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

<u>COUNT V – COPYRIGHT INFRINGEMENT AS TO</u> DEFENDANT CHRISTIANE MEUNIER As Officer of Chariot Publishing, Inc.

- 40. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-39 above.
- 41. The Defendant Meunier is an officer of Chariot Publishing, Inc., the General Partner of the Limited Partnership Chitra Publications.
- 42. By virtue of the unauthorized use, reproduction, and distribution of the copyrighted design and the copyrighted pattern, Defendant Meunier has infringed Plaintiff Pelletier's copyrighted design and copyrighted pattern all in violation of Title 17 of the United States Code.
- 43. The specific acts of copyright infringement alleged above, as well as Defendant Meunier's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier from committing further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT VI –CONTRIBUTORY LIABILITY AS TO DEFENDANT CHRISTIANE MEUNIER As Officer of Chariot Publishing, Inc.

44. Plaintiff Pelletier repeats and realleges each of the allegations contained in Paragraphs 1 through 43 above.

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45. The Defendant Meunier, with knowledge of the infringing activity of the Defendant Talbot, induced, caused, or materially contributed to the infringing conduct of the Defendant Talbot or otherwise aided or facilitated the infringement with reason to know of the direct infringement.

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46. The specific acts and/or contributory conduct of the Defendant Meunier as alleged above have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier from committing or contributing to any further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT VII -VICARIOUS LIABILITY AS TO DEFENDANT CHRISTIANE MEUNIER AS Officer of Chariot Publishing, Inc.

- 47. Plaintiff Pelletier repeats and realleges each of the allegations contained in Paragraphs 1 through 46 above.
- 48. The Defendant Meunier as officer of Defendant Chariot had the right and authority to direct the conduct of the Defendant Chariot and had a financial interest in the conduct of the Defendant Chariot.
- 49. The Defendant Meunier as officer of the Defendant Chariot personally participated in the infringement of Plaintiff Pelletier's copyrighted design and copyrighted pattern and derived financial benefit from the infringing activities.
- 50. The Defendant Meunier as officer of the Defendant Chariot used the Defendant Chariot as an instrument to carry out the copyright infringement.
- The Defendant Meunier as officer of the Defendant Chariot was the dominant 51. influence on the Defendant Chariot and determined the policies that resulted in the infringement.
- 52. The specific acts of the Defendant Meunier, as officer the Defendant Chariot have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier as officer of Defendant Chariot from committing further acts of copyright infringement, the Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT VIII – COPYRIGHT INFRINGEMENT AS TO DEFENDANT CHRISTIANE MEUNIER As Owner of Chitra Publications

- 53. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-52 above.
- 54. The Defendant Meunier is the owner of Chitra Publications, Commonwealth of Pennsylvania, entity number 956722 (fictitious names), a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, now or formerly of 272 Main Street, New Milford, Pennsylvania 18834, which published and sold magazines dedicated to quilting, wherein such publications included pictures of quilt designs and instructions for creating the pictured quilt designs, and further wherein such publications were offered for sale and sold over the Internet and/or in retail stores throughout the United States.
- 55. By virtue of the unauthorized use, reproduction, and distribution of the copyrighted design and the copyrighted pattern, Defendant Meunier has infringed Plaintiff Pelletier's copyrighted design and copyrighted pattern all in violation of Title 17 of the United States Code.
- 56. The specific acts of copyright infringement alleged above, as well as Defendant Meunier's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier from committing further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT IX -CONTRIBUTORY LIABILITY AS TO DEFENDANT CHRISTIANE MEUNIER As Owner of Chitra Publications

- Plaintiff Pelletier repeats and realleges each of the allegations contained in 57. Paragraphs 1 through 56 above.
- 58. The Defendant Meunier with knowledge of the infringing activity of the Defendant Talbot, induced, caused, or materially contributed to the infringing conduct of the Defendant Talbot or otherwise aided or facilitated the infringement with reason to know of the direct infringement.

59. The specific acts and/or contributory conduct of the Defendant Meunier as alleged above have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier from committing or contributing to any further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT X –VICARIOUS LIABILITY AS TO DEFENDANT CHRISTIANE MEUNIER As Owner of Chitra Publications

- 60. Plaintiff Pelletier repeats and realleges each of the allegations contained in Paragraphs 1 through 59 above.
- 61. The Defendant Meunier as owner of Defendant Chitra Publications had the right and authority to direct the conduct of the Defendant Chitra and had a financial interest in the conduct of the Defendant Chitra.
- 62. The Defendant Meunier as owner of the Defendant Chitra personally participated in the infringement of Plaintiff Pelletier's copyrighted design and copyrighted pattern and derived financial benefit from the infringing activities.
- 63. The Defendant Meunier as owner of the Defendant Chitra used the Defendant Chitra as an instrument to carry out the copyright infringement.
- 64. The Defendant Meunier as owner of the Defendant Chitra was the dominante influence in the Defendant Chitra and determined the policies that resulted in the infringement.
- 65. The specific acts of the Defendant Meunier, as owner of the Defendant Chitra have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier as owner of the Defendant Chitra from committing further acts of copyright infringement, the Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

<u>COUNT XI – COPYRIGHT INFRINGEMENT AS TO</u> <u>DEFENDANT CHRISTIANE MEUNIER d/b/a Moon Over Mountain</u>

66. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-65 above.

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- 67. The Defendant Meunier does business as Moon Over Mountain, having a usual place of business at 2 Public Avenue, Montrose, Pennsylvania 18801-1220, which publishes and sells magazines and books dedicated to quilting, wherein such publications include pictures of quilt designs and instructions for creating the pictured quilt designs and further wherein such publications are offered for sale and sold over the Internet and in retail stores throughout the United States.
- 68. By virtue of the unauthorized use, reproduction, and distribution of the copyrighted design and the copyrighted pattern, Defendant Meunier d/b/a Moon Over Mountain has infringed Plaintiff Pelletier's copyrighted design and copyrighted pattern all in violation of Title 17 of the United States Code.
- 69. The specific acts of copyright infringement alleged above, as well as Defendant Meunier's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier d/b/a Moon Over Mountain from committing further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.
- 70. As of February 17, 2006, Defendant Meunier d/b/a Moon Over Mountain continues to publish, advertise and to sell the Book and magazine for profit, without Plaintiff Pelletier's permission, as evidenced by the following websites which were last accessed on February 17, 2006: http://www.quiltsource.ca/qshtml/ch1/chlnew.html; http://www.quiltbooksusa.com/subcatmfgprod.asp?0-+200&1=279&2; and http://www.quilttownusa.com/eshop/10browse.asp?category=Back+Issue. See Exhibit H.
- By virtue of the unauthorized use, reproduction and distribution of the 71. copyrighted design and the copyrighted pattern, Defendant Meunier d/b/a Moon Over Mountain, has infringed Plaintiff Pelletier's copyrighted design and copyrighted pattern all in violation of Title 17 of the United States Code.
- 72. The specific acts of copyright infringement alleged above, as well as Defendant Meunier d/b/a Moon Over Mountain's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier d/b/a Moon Over Mountain from committing further acts of copyright infringement,

Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

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COUNT XII -CONTRIBUTORY LIABILITY AS TO DEFENDANT CHRISTIANE MEUNIER d/b/a Moon Over Mountain

- 73. Plaintiff Pelletier repeats and realleges each of the allegations contained in Paragraphs 1 through 72 above.
- 74. The Defendant Meunier d/b/a Moon Over Mountain with knowledge of the infringing activity of the Defendant Talbot, induced, caused, or materially contributed to the infringing conduct of the Defendant Talbot or otherwise aided or facilitated the infringement with reason to know of the direct infringement.
- 75. The specific acts and/or contributory conduct of the Defendant Meunier d/b/a Moon Over Mountain as alleged above have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier d/b/a Moon Over Mountain from committing or contributing to any further acts of copyright infringement, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT XIII – VICARIOUS LIABILITY AS TO DEFENDANT CHRISTIANE MEUNIER d/b/a Moon Over Mountain

- 76. Plaintiff Pelletier repeats and realleges each of the allegations contained in Paragraphs 1 through 75 above.
- 77. The Defendant Meunier d/b/a Moon Over Mountain has the right and authority to direct the conduct of and has a financial interest in the business entity known as Moon Over Mountain, having a usual place of business at 2 Public Avenue, Montrose, Pennsylvania 18801-1220, which publishes and sells magazines and books dedicated to quilting, wherein such publications include pictures of quilt designs and instructions for creating the pictured quilt designs and further wherein such publications are offered for sale and sold over the Internet and in retail stores throughout the United States.

- 78. The Defendant Meunier d/b/a Moon Over Mountain personally participates in the infringement of Plaintiff Pelletier's copyrighted design and copyrighted pattern and derives financial benefit from the infringing activities.
- 79. The Defendant Meunier d/b/a Moon Over Mountain uses Moon Over Mountain as an instrument to carry out the copyright infringement.
- 80. The Defendant Meunier d/b/a Moon Over Mountain is the dominant influence over Moon Over Mountain and determines the policies that result in the infringement.
- 81. The specific acts of the Defendant Meunier d/b/a Moon Over Mountain have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless this Court restrains Defendant Meunier d/b/a Moon Over Mountain from committing further acts of copyright infringement, the Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT XIV – FALSE DESIGNATION OF ORIGIN AS TO DEFENDANT SANDRA T. TALBOT

- 82. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-81 above.
- 83. As established by the Copyright Registration, Plaintiff Pelletier is the author and the owner of the Copyrighted Pattern and of the Copyrighted Design.
- 84. Through her correspondence with Defendant Chitra, and as evidenced by the attribution of the Copyrighted Design to her name, as shown in Exhibit F, Defendant Talbot has falsely portrayed herself as the author of the Copyrighted Design.
- 85. Defendant Talbot's false designation of origin is likely to cause consumer confusion as to the authorship and ownership of the Copyrighted Design.
- 86. The false designations of origin as well as Defendant Talbot's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless the Court restrains Defendant Talbot from further false designations of the Copyrighted Design, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT XV – FALSE DESIGNATION OF ORIGIN AS TO DEFENDANT CHITRA PUBLICATIONS

- 87. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-86 above.
- 88. As established by the Copyright Registration, Plaintiff Pelletier is the author and the owner of the Copyrighted Pattern and of the Copyrighted Design.
- 89. Despite Plaintiff Pelletier's notification to Defendant Chitra that Plaintiff Pelletier is the author and the owner of the Copyrighted Design and of the Copyrighted Pattern, Defendant Chitra has continued to attribute authorship and ownership of the Copyrighted Design and Copyrighted Pattern to Defendant Talbot in Defendant's Chitra's various publications which are sold over the Internet and in various retail stores.
- 90. Defendant Chitra's false designation of origin is likely to cause consumer confusion as to the authorship and ownership of the Copyrighted Pattern and Copyrighted Design.
- 91. The false designations of origin as well as Defendant Chitra's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless the Court restrains Defendant Chitra from further false designations of the Copyrighted Design, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

<u>COUNT XVI – FALSE DESIGNATION OF ORIGIN</u>

AS TO DEFENDANT CHARIOT PUBLISHING, INC. As General Partner of Defendant Chitra Publications

- 92. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-91 above.
- 93. As established by the Copyright Registration, Plaintiff Pelletier is the author and the owner of the Copyrighted Pattern and of the Copyrighted Design.
- 94. Despite Plaintiff Pelletier's notification to Defendant Chariot that Plaintiff Pelletier is the author and the owner of the Copyrighted Design and of the Copyrighted Pattern, Defendant Chariot has continued to attribute authorship and ownership of the Copyrighted

Design and Copyrighted Pattern to Defendant Talbot in Defendant Chariot's various publications which are sold over the Internet and in various retail stores.

- 95. Defendant Chariot's false designation of origin is likely to cause consumer confusion as to the authorship and ownership of the Copyrighted Pattern and Copyrighted Design.
- 96. The false designations of origin as well as Defendant Chariot's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless the Court restrains Defendant Chariot from further false designations of the Copyrighted Design, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT XVII – FALSE DESIGNATION OF ORIGIN

AS TO DEFENDANT CHRISTIANE MEUNIER As Officer of the Defendant Chariot Publishing, Inc.

- 97. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-96 above.
- 98. As established by the Copyright Registration, Plaintiff Pelletier is the author and the owner of the Copyrighted Pattern and of the Copyrighted Design.
- 99. Despite Plaintiff Pelletier's notification to Defendant Meunier that Plaintiff
 Pelletier is the author and the owner of the Copyrighted Design and of the Copyrighted Pattern,
 Defendant Meunier has continued to attribute authorship and ownership of the Copyrighted
 Design and Copyrighted Pattern to Defendant Talbot in Defendant Meunier's various
 publications which are sold over the Internet and in various retail stores.
- 100. Defendant Meunier's false designation of origin is likely to cause consumer confusion as to the authorship and ownership of the Copyrighted Pattern and Copyrighted Design.
- 101. The false designations of origin as well as Defendant Meunier's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless the Court restrains Defendant Meunier from further false designations of the Copyrighted Design, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT XVIII – FALSE DESIGNATION OF ORIGIN AS TO DEFENDANT CHRISTIANE MEUNIER As Owner of Defendant Chitra **Publications**

102. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-101 above.

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- 103. As established by the Copyright Registration, Plaintiff Pelletier is the author and the owner of the Copyrighted Pattern and of the Copyrighted Design.
- 104. Despite Plaintiff Pelletier's notification to Defendant Meunier that Plaintiff Pelletier is the author and the owner of the Copyrighted Design and of the Copyrighted Pattern, Defendant Meunier has continued to attribute authorship and ownership of the Copyrighted Design and Copyrighted Pattern to Defendant Talbot in Defendant Meunier's various publications which are sold over the Internet and in various retail stores.
- 105. Defendant Meunier's false designation of origin is likely to cause consumer confusion as to the authorship and ownership of the Copyrighted Pattern and Copyrighted Design.
- 106. The false designations of origin as well as Defendant Meunier's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless the Court restrains Defendant Meunier from further false designations of the Copyrighted Design, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT XIX – FALSE DESIGNATION OF ORIGIN AS TO DEFENDANT CHRISTIANE MEUNIER d/b/a Moon Over Mountain

- Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-106 above.
- As established by the Copyright Registration, Plaintiff Pelletier is the author and 108. the owner of the Copyrighted Pattern and of the Copyrighted Design.
- 109. Despite Plaintiff Pelletier's notification to Defendant Meunier that Plaintiff Pelletier is the author and the owner of the Copyrighted Design and of the Copyrighted Pattern, Defendant Meunier has continued to attribute authorship and ownership of the Copyrighted

Design and Copyrighted Pattern to Defendant Talbot in Defendant Meunier's various publications which are sold over the Internet and in various retail stores.

- 110. Defendant Meunier's false designation of origin is likely to cause consumer confusion as to the authorship and ownership of the Copyrighted Pattern and Copyrighted Design.
- 111. The false designations of origin as well as Defendant Meunier's entire course of conduct have caused and continue to cause great and incalculable damage to Plaintiff Pelletier. Unless the Court restrains Defendant Meunier from further false designations of the Copyrighted Design, Plaintiff Pelletier will suffer irreparable injury and harm for which she has no adequate remedy at law.

COUNT XX – UNFAIR COMPETITION UNDER M.G.L. CHAPTER 93A AS TO DEFENDANT SANDRA T. TALBOT

- 112. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-111 above.
- 113. Defendant Talbot is using the Copyrighted Design in a manner that misappropriates Plaintiff's goodwill in the Copyrighted Design. Additionally, by asserting in commerce that she is the author and owner of the Copyrighted Design, Defendant Talbot is misrepresenting the origin of the Copyrighted Design. Such actions constitute an unfair method of competition and unfair or deceptive acts or practices in the conduct of trade or commerce.
- 114. Defendant Talbot's participation in these unfair and deceptive acts has occurred primarily and substantially within the Commonwealth of Massachusetts.
- 115. By engaging in the activities described above, Defendant Talbot has engaged in an unfair method of competition and in unfair and deceptive acts and practices in violation of the Commonwealth of Massachusetts Consumer Protection Laws, M.G.L. c. 93A, § 11.
- 116. Defendant Talbot's acts of unfair competition were willful and knowing and have caused and are causing great and irreparable injury to Plaintiff and to the Copyrighted Design and goodwill represented thereby in an amount that cannot be ascertained at this time and, unless restrained, will cause further irreparable injury, leaving Plaintiff Pelletier with no adequate remedy at law.

117. By reason of the foregoing, Plaintiff Pelletier is entitled to injunctive relief against Defendant Talbot, restraining further acts of unfair competition, and to recover attorneys' fees and any damages proven to have been caused by reason of Defendant Talbot's aforesaid acts of unfair competition.

COUNT XXI – UNFAIR COMPETITION UNDER M.G.L. CHAPTER 93A AS TO DEFENDANT CHITRA PUBLICATIONS

- 118. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-117 above.
- 119. Defendant Chitra is using the Copyrighted Design and the Copyrighted Pattern in a manner that misappropriates Plaintiff's goodwill in the Copyrighted Design and the Copyrighted Pattern. Additionally, by asserting in commerce that Defendant Talbot is the author and owner of the Copyrighted Design, Defendant Chitra is misrepresenting the origin of the Copyrighted Design. Such actions constitute an unfair method of competition and unfair or deceptive acts or practices in the conduct of trade or commerce.
- 120. Defendant Chitra's participation in these unfair and deceptive acts has occurred primarily and substantially within the Commonwealth of Massachusetts.
- 121. By engaging in the activities described above, Defendant Chitra has engaged in an unfair method of competition and in unfair and deceptive acts and practices in violation of the Commonwealth of Massachusetts Consumer Protection Laws, M.G.L.c. 93A, § 11.
- 122. Defendant Chitra's acts of unfair competition were willful and knowing and have caused and are causing great and irreparable injury to Plaintiff and to the Copyrighted Design, Copyrighted Pattern, and goodwill represented thereby in an amount that cannot be ascertained at this time and, unless restrained, will cause further irreparable injury, leaving Plaintiff Pelletier with no adequate remedy at law.
- 123. By reason of the foregoing, Plaintiff Pelletier is entitled to injunctive relief against Defendant Chitra, restraining further acts of unfair competition, and to recover attorneys' fees and any damages proven to have been caused by reason of Defendant Chitra's aforesaid acts of unfair competition.

COUNT XXII – UNFAIR COMPETITION UNDER M.G.L. CHAPTER 93A AS TO DEFENDANT CHARIOT PUBLISHING, INC. General Partner of CHITRA **PUBLICATIONS**

- 124. Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-123 above.
- 125. Defendant Chariot is using the Copyrighted Design and the Copyrighted Pattern in a manner that misappropriates Plaintiff's goodwill in the Copyrighted Design and the Copyrighted Pattern. Additionally, by asserting in commerce that Defendant Talbot is the author and owner of the Copyrighted Design, Defendant Chariot is misrepresenting the origin of the Copyrighted Design. Such actions constitute an unfair method of competition and unfair or deceptive acts or practices in the conduct of trade or commerce.
- 126. Defendant Chariot's participation in these unfair and deceptive acts has occurred primarily and substantially within the Commonwealth of Massachusetts.
- By engaging in the activities described above, Defendant Chariot has engaged in an unfair method of competition and in unfair and deceptive acts and practices in violation of the Commonwealth of Massachusetts Consumer Protection Laws, M.G.L.c. 93A, § 11.
- Defendant Chariot's acts of unfair competition were willful and knowing and 128. have caused and are causing great and irreparable injury to Plaintiff and to the Copyrighted Design, Copyrighted Pattern, and goodwill represented thereby in an amount that cannot be ascertained at this time and, unless restrained, will cause further irreparable injury, leaving Plaintiff Pelletier with no adequate remedy at law.
- By reason of the foregoing, Plaintiff Pelletier is entitled to injunctive relief against Defendant Chariot, restraining further acts of unfair competition, and to recover attorneys' fees and any damages proven to have been caused by reason of Defendant Chariot's aforesaid acts of unfair competition.

COUNT XXIII – UNFAIR COMPETITION UNDER M.G.L. CHAPTER 93A AS TO DEFENDANT CHRISTIANE MEUNIER d/b/a Moon Over Mountain

- Plaintiff Pelletier repeats and realleges each of the allegations contained in paragraphs 1-129 above.
- 131. Defendant Meunier d/b/a Moon Over Mountain is using the Copyrighted Design and the Copyrighted Pattern in a manner that misappropriates Plaintiff's goodwill in the

Copyrighted Design and the Copyrighted Pattern. Additionally, by asserting in commerce that Defendant Talbot is the author and owner of the Copyrighted Design, Defendant Meunier d/b/a Moon Over Mountain is misrepresenting the origin of the Copyrighted Design. Such actions constitute an unfair method of competition and unfair or deceptive acts or practices in the conduct of trade or commerce.

- 132. Defendant Meunier d/b/a Moon Over Mountain's participation in these unfair and deceptive acts has occurred primarily and substantially within the Commonwealth of Massachusetts.
- 133. By engaging in the activities described above, Defendant Meunier d/b/a Moon Over Mountain has engaged in an unfair method of competition and in unfair and deceptive acts and practices in violation of the Commonwealth of Massachusetts Consumer Protection Laws, M.G.L.c. 93A, § 11.
- 134. Defendant Meunier d/b/a Moon Over Mountain's acts of unfair competition were willful and knowing and have caused and are causing great and irreparable injury to Plaintiff and to the Copyrighted Design, Copyrighted Pattern, and goodwill represented thereby in an amount that cannot be ascertained at this time and, unless restrained, will cause further irreparable injury, leaving Plaintiff Pelletier with no adequate remedy at law.
- 135. By reason of the foregoing, Plaintiff Pelletier is entitled to injunctive relief against Defendant Meunier d/b/a Moon Over Mountain, restraining further acts of unfair competition, and to recover attorneys' fees and any damages proven to have been caused by reason of Defendant Meunier d/b/a Moon Over Mountain's aforesaid acts of unfair competition.

RELIEF REQUESTED

WHEREFORE, the Plaintiff prays that:

- I. Defendants, their agents, servants, employees, and all persons acting under their permission and authority, be enjoined and restrained from infringing, in any manner, Plaintiff's copyrighted work pursuant to 17 U.S.C. § 502;
- II. Defendants be ordered to pay damages for each claim of infringement, pursuant to 17 U.S.C. § 504;
- III. Defendants be ordered to pay costs, including reasonable attorneys fees, pursuant to 17 U.S.C. § 505; and

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- IV. Defendants be ordered to pay the Plaintiff their gross revenue derived from each infringing work or act of infringement pursuant to 17 U.S.C. §504(b).
- V. Defendants be ordered to pay damages, costs and attorneys' fees for the violations of § 43(a) of the Lanham Act, pursuant to 15 U.S.C. § 1117.
- VI. That pursuant to M.G.L.c. 93A, § 11, Plaintiff be awarded double or treble damages, attorneys' fees, and costs.
 - VII. Any other and further relief which the Court may deem appropriate.

THE PLAINTIFF JOANN PELLETIER

/s/ Claire L. Thompson By_{-} Claire L. Thompson Doherty, Wallace, Pillsbury & Murphy, P.C. 1414 Main Street, 19th Floor Springfield, MA 01144-1900 (413) 733-3111 (413) 734-3910 Fax B.B.O. #550262

CERTIFICATE OF SERVICE

I, Claire L. Thompson, do hereby certify that I have caused a copy of the foregoing to be served upon counsel of record by mailing same first class mail, postage prepaid, to: Steven M. Coyle, Esq., Cantor Colburn, LLP, 55 Griffin Road South, Bloomfield, CT 06002.

/s/ Claire L. Thompson Dated: February 24, 2006 Claire L. Thompson



"sew" many SDOOLS

@ 1993 Jo Ann Pelletier - all rights reserved

Please read all instructions carefully.

The SPOOLS are "courthouse step" log cabin blocks. Finished block size is 3 3/4" square (4 1/4" including 1/4" seams). You will be making 96 "spools" blocks - 8 across x 12 down. "Scant" 1/4" seams are very important.

CUT-

THREAD "center" - various plaids, strips, or prints Cut 96, 2 3/4" squares

LOGS - all "logs" are cut 3/4" wide

BACKGROUND/muslin logs - amounts are for entire quilt

 $#1 \log = 3/4$ " wide x 2 3/4" long - CUT 192

 $#3 \log = 3/4$ " wide x 3 1/4" long - CUT 192

 $#5 \log = 3/4$ " wide x 3 3/4" long - CUT 192

SPOOL logs - for EACH block cut the following cut 2 of EACH of log #2, #4, #6 (for each block). Remember, there are 96 blocks.

 $\#2 \log = 3/4$ " wide x 3 1/4" long - CUT 2

 $\#4 \log = 3/4$ " wide x 3 3/4" long - CUT 2

 $\#6 \log = 3/4$ " wide x 4 1/4" long - CUT 2

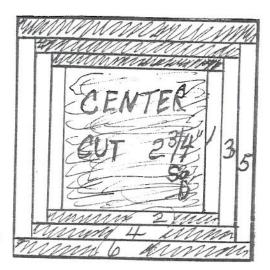
<u>SASHING/muslin</u> - cut <u>212</u> (total amount needed) Cut 1 1/2" wide x 4 1/4" long

CORNERSTONES - various black prints Cut 117, 1 1/2" squares

BORDER 1 - CUT 6, 1 1/4" x 40" strips (or width of fabric selvage to selvage)

BORDER 2 - CUT 6, 3 1/4" x 40" strips (or width of fabric selvage to selvage)

BINDING - CUT 6, 2 1/2" x 40" strips (or width of fabric selvage to selvage)



Page 2

CONSTRUCTION - all seams are sewn with "scant" 1/4" seams. This is very important. If your seam allowance is too wide, the block will not measure the correct size. You will check the size of the block AFTER each "ROUND" (see at end of step 1 how to do this).

STEP 1 - "ROUND 1"

to the 2 3/4" square "THREAD center", add logs #1 (3/4" x 2 3/4" background fabric) to EACH SIDE. Press towards the logs. then add #2 logs (3/4" x 3 1/4" spool fabric) and press towards the logs.



IMPORTANT - check the size of the block with your "square ruler". The block should measure 3 1/4" sq. Trim if necessary to get rid of any excess over 3 1/4" sq. If the block measures less than the correct size, your seams are too wide.

- ROUND 1 = 3 1/4" SQUARE -

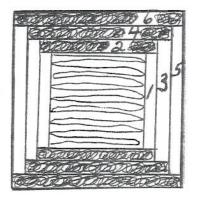
STEP 2 -

Add logs #3 - (3/4" x 3 1/4" background fabric), press Add logs #4 (3/4" x 3 3/4" spool fabric), press ROUND 2 = 3 3/4" square



STEP 3 -

Add logs #5 (3/4" x 3 3/4" background fabric), press Add logs #6 (3/4" x 4 1/4" spool fabric), press ROUND $3 = 4 \frac{1}{4}$ " square



Page 3

ASSEMBLY -

Lay the blocks down - 8 rows across x 12 rows down as the diagram below shows. Leave a space and place the SASHING (1 1/2" x 4 1/4" strips) and the 1 1/2" CORNERSTONE blocks as pictured.

Stitch together by rows -

ROW 1 - CORNERSTONES & SASHING, press to sashing.

ROW 2 - SASHING & "SPOOL" block, press to sashing.

Continue till rows are done

Stitch the ROWS together.

BORDER 1 - cut 2 of the strips to fit top and bottom of quilt - should be about 39 1/2" (check the size of your quilt top). Stitch, press toward outside. Stitch the 4 remaining strips together - measure, cut and add to sides (should be about 60"). Press

BORDER 2 - Top and bottom of quilt should be about 41" wide (remember, check to see what yours actually measures).. Cut 2 border strips to fit (or piece strips together if needed). Stitch and press. Stitch the 4 remaining strips together - measure, cut and add to sides (should be about 66"). Press

FINISHING - Layer top, batting & backing.

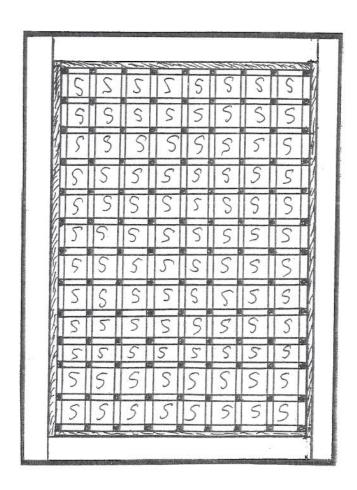
> Quilt or tie. (recommendation -"stitch in the ditch" quilting)

Add binding

Thank you for purchasing my pattern. I hope you enjoyed the process of making this "very UNIQUE" quilt.

a ann Pelletier

©1993 Jo Ann Pelletier - all rights reserved



46" x 66" finished quilt

that finish 1/4" wide. You'll be successful (making these These SIDEOR are "courthouse step" log cabin blocks. The blocks finish 3 3/4" square and are made with logs small logs) by following the instructions carefully. Very "UNIQUE"!

MATERIALS NEEDED:

BACKGROUND muslin - 3 1/4 yards (used in SPOOLS - 20 (more or less) brown print "fat eighth" (a fat eighth measures 9" x 22") CORNERSTONES - 117, 1 1/2" squares cut THREAD "CENTER" - 96 (2 3/4" squares) from 20 (more or less) black prints "spool" block and for SASHING BACKING & BATTING - 49" x 69" BORDER 2 (black print) - 3/4 yard BINDING (black) - 3/4 yard BORDER 1 (red) - 1/3 yard plaids, strips or prints

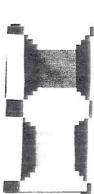
Jo Ann Pelletier designs Longmeadow MA OIIIL P O Box 60732 413 567-7146

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@ 1993 Jo Ann Pelletter



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
Register of Copyrights, United States of America

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EFFECTIVE DATE OF	REGIST	RATION	
SEP	17	2004	
Month	Day	Year	

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Case 3:05-cv,30109-MAP Document 15-5 Filed 02/24/2006 Page 1 of 1

of Cabin Click Falum Pelicities

- april 2000
Because of copyright infringment laws

(and how the growing awareness of design rights has affected our quiltmaking)

| FEEL THAT I MUST MAKE THE

FOLLOWING REQUEST -

The LOG CABIN sampler blocks are intended to be used in your log Cabin sampler being made in class. The finished quit (or whatever you make using these blocks) is for your own personal use and enjoyment - NOT for public display or publication. This also applies to "Bonus" quilts made in class.

John Felletier

ATTORNEYS AT LAW

ONE MONARCH PLACE, SUITE 1900 SPRINGFIELD, MASSACHUSETTS 01144-1900

TELEPHONE (413) 733-3111

TELECOPIER (413) 734-3910

WWW DWPM COM E MAIL: DWPM@DWPM.COM

MATTHEW J. RYAN JR.

DUDLEY B. WALLACE
(1900-1987)
LOUIS W. DOHERTY
(1898-1990)
FREDERICK S. PILLSBURY
(1919-1996)
ROBERT E. MURPHY
(1919-2003)
SAMUEL A. MARSELLA
(1931-2004)

REGISTERED PATENT ATTORNEY
ALSO ADMITTED IN CONNECTICUT
ALSO ADMITTED IN NEW YORK
ALSO ADMITTED IN DISTRICT OF COLUMBIA

September 21, 2004

KAREN K. CHADWELL*1
JOHN E. BONINI*
MICHAEL J. BONANNO*

PAUL S. DOHERTY

PHILIP J. CALLAN, JR GARY P. SHANNON ROBERT L. LEONARD A. CRAIG BROWN

JEFFREY MEEHAN

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BERNADETTE HARRIGAN‡

BRENDA S. DOHERTY

MICHELE A. ROOKE THOMAS E. DAY*

CERTIFIED MAIL RETURN RECEIPT REQUESTED

7160 3901 9848 5876 8040

Ms. Sandra T. Talbot 15 Prynnwood Road Longmeadow, MA 01106 Certified Article Number

SENDERS RECORD

CERTIFIED MAIL RETURN RECEIPT REQUESTED 7160 3901 9844 9045 8675

Ms. Christiane Meunier Chitra Publications, Inc. 2 Public Avenue Montrose, PA 18801-1220 Certified Article Number

SENDERS RECORD

Re:

Copyright Infringement

Dear Ms. Talbot and Ms. Meunier:

Please be advised that this office represents JoAnn Pelletier, of Longmeadow, Massachusetts. JoAnn is the owner of certain copywritten material as further described in this letter. It has come to our attention that you are using JoAnn's copywritten material consisting of a quilt pattern which you have called "Just Spooling Around" (the "Protected Design" or the "Pattern") without authority.

As you may know, by federal law, the owner of a copyright has the exclusive right to reproduce and distribute the copyrighted work. Accordingly, a validly copyrighted work is infringed when unauthorized reproductions of the copyrighted work have been made. JoAnn taught her spool Protected Design in quilting classes beginning in 1993. She disclosed the Pattern for the purpose of teaching her students. She made it clear to all of her students that they were not authorized to copy and distribute the Pattern, as it was her work of artistic expression. She did authorize each student to use the Pattern as a learning tool and to make a quilt for her

Ms. Sandra T. Talbot Ms. Christiane Meunier September 21, 2004 Page 2

own use and enjoyment. Ms. Talbot threatened to distribute the Protected Design forcing JoAnn to disengage her from her class in September, 2000. In 2003, Ms. Talbot in fact distributed the Protected Design to Chitra Publications, Inc. representing it as her own, in violation of federal copyright law.

Accordingly, demand is made of Ms. Talbot as follows:

- JoAnn demands that Ms. Talbot cease and desist claiming ownership of the Pattern and Protected Design.
- 2. JoAnn demands that Ms. Talbot you cease and desist distributing, copying and reproducing the Pattern and Protected Design.
- JoAnn demands that Ms. Talbot cause to be published in Chitra Publications' next issue of <u>Quiltworks Today</u> and online the following written apology for a period of six months verbatim displayed in font size and legibility equal to that of the entire publication:

Sandra T. Talbot, has falsely claimed ownership of the "Just Spooling Around" protected design without authority of its rightful owner. Sandra T. Talbot apologizes for the use of the intellectual property of JoAnn Pelletier of Longmeadow, Massachusetts. JoAnn Pelletier is the creator and owner of the pattern for "Just Spooling Around".

JoAnn demands damages in the total amount of \$50,000.00.

This demand is supported by the following:

Copyright Infringement.

Federal law at 17 USC §102(a) states that copyright protection subsists, in accordance with this title, in original works of authorship fixed in any tangible medium of expression, now known or later developed, from which they can be perceived, reproduced, or otherwise communicated, either directly or with the aid of a machine or device. Works of authorship include the following categories: (1) literary works; (2) musical works, including any accompanying words; (3) dramatic works, including any accompanying music; (4) pantomimes and choreographic works; (5) pictorial, graphic, and sculptural works; (6) motion pictures and other audiovisual works; (7) sound recordings; and (8) architectural works.

JoAnn owns the copyright to the pictorial, graphic work consisting of the Pattern to all of the quilts which are her original works of artistic expression and protected as her intellectual property. JoAnn's spool quilt pattern is one that she designed independently over a period of many years. As soon as she sketched and wrote the Pattern on paper, her copyright subsists. Her documentary evidence supports that she wrote the Pattern many years ago. As the copyright

Ms. Sandra T. Talbot Ms. Christiane Meunier September 21, 2004 Page 3

owner of this artistic work, JoAnn has the exclusive right to reproduce and to distribute the Pattern and Protected Design (17 USC § 106). Because Ms. Talbot and Chitra have published, reproduced and distributed the Pattern and the Protected Design without JoAnn's authorization, you have both infringed JoAnn's copyright upon publication of the Protected Design and Pattern in Chitra Publications, Inc. *Quiltworks Today*. October/November, 2003 issue at pages 26 and 27 (the "magazine").

Subsequent to that unauthorized publication, you recently published, reproduced and distributed the Protected Design in a book entitled <u>A Few of My Favorite Scrap Ouilts</u> also published by Chitra Publications, Inc. (the "book"). In fact, it is featured on the cover of the book, on page 3 in the book and the Pattern is duplicated in the book at pages 11 and 15 in violation of federal copyright law. You, Ms. Talbot, have held yourself out to by the owner of the artistic expression manifested in the Protected Design in both the magazine and the book when in fact you are not. You have published your photograph with JoAnn's quilt Pattern, falsely claiming credit for its design. You falsely informed Chitra Publications that you were the owner of the Protected Design and that no one else had any rights to the Protected Design, when you knew that to be false.

Not only have your actions been egregious, insulting and personally cruel, but you have violated federal and state law. Both you and Chitra have taken action in reckless disregard for the true owner's copyright notwithstanding actual notice of such right.

Chitra Publications, Inc. has reproduced, duplicated, published and distributed the Protected Design in violation of federal copyright law.

Chitra may attempt to claim that it relied to its detriment on the false claims of Ms. Talbot. Unfortunately for Chitra, detrimental reliance is no defense to copyright infringement. Accordingly, demand is made of Chitra as follows:

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- JoAnn demands that Chitra remove the magazine from the website and cease and desist sales of that issue of the magazine.
- 4. JoAnn demands damages in the total amount of \$50,000.00.

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Ms. Sandra T. Talbot Ms. Christiane Meunier September 21, 2004 Page 4

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Please do not contact or attempt to contact JoAnn Pelletier. All communication regarding this matter must be made through the undersigned. Please confirm immediately upon receipt of this letter your prompt compliance with the demands herein.

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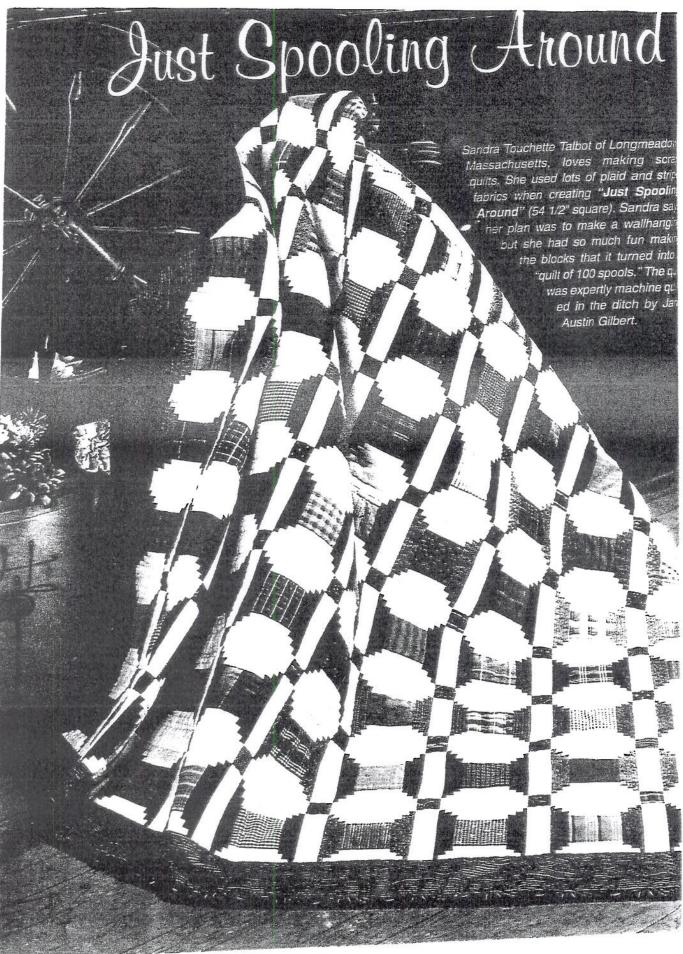
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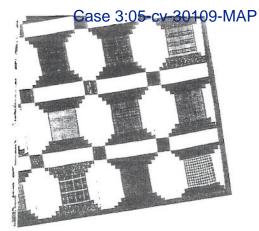
cc: JoAnn Pelletier





October/November 2003

n- 1 'a muilt



Quilt Size: 54 1/2" square Block Size: 4" square

Materials

- · 100 assorted prints, plaids, and stripes, each at least 3" square
- 25 brown prints, each at least 13" square

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在於一個內子

- · 21 assorted black prints, each at least 3" square
- 2 1/3 yards muslin
- 1 3/4 yards black stripe for the border
- 2/3 yard black print for the binding
- 3 1/2 yards backing fabric
- 59" square of batting
- Foundation paper (optional)

Cutting

Dimensions include a 1/4" seam allowance.

- Cut 100: 3" squares, assorted prints, plaids, and stripes From each brown print: NOTE: Separate each group of 8 strips into 2 piles of 4.
- Cut 8: 3/4" x 4 1/2" strips
- Cut 8: 3/4" x 4" strips
- Cut 8: 3/4" x 3 1/2" strips

From the muslin:

 Cut 180: 1 1/2" x 4 1/2" strips, for the sashing

Fust Spooling Arous

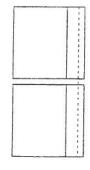
- Cut 200: 3/4" x 4" strips
- Cut 200: 3/4" x 3 1/2" strips
- Cut 200: 3/4" x 3" strips

From the assorted black prints:

- Cut 81: 1 1/2" squares Also:
- Cut 4: 3 1/4" x 58" strips, black stripe, for the border
- Cut 6: 2 1/2" x 40" strips, black print, for the binding

Directions

1. Stitch a 3/4" x 3" muslin strip to a 3" print square. Chain stitch a 3/4" x 3" muslin strip to each of the remaining 3" squares.



- 2. Clip the units apart.
- 3. Chain stitch a 3/4" x 3" muslin strip to the opposite side of each square.
- 4. Clip the units apart and press the seam allowances toward the muslin. Trim the seam allowances to 3/16".



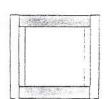
Chain stitch 3/4" x 3 1/2" print strips to the square u shown. Use only 4 strips of brown print. Clip the units a



6. Chain stitch a 3/4" x matching brown print strip opposite side of each unit.



- 7. Clip the units apart and the seam allowances towa brown print. Trim the allowances to 3/16".
- Chain stitch 3/4" x 3 1/2" strips to the muslin sides unit. Press and trim, as befc



9. Chain stitch 3/4" x 4" m brown print strips to eac (continued on p



Sandra Talbot

Quilt Size: 54 1/2" square Block Size: 4" square



Yardage is based on fabric with a useable width of 40".

- 100 assorted prints, plaids, and stripes, each at least 3" square
- 25 brown prints, each at least 10" square
- 21 assorted black prints each at least 3" square
- 2 1/3 yards muslin
- 1 3/4 yards black stripe for the border
- 2/3 yard black print for the binding
- 3 1/2 yards backing fabric
- 59" square of batting
- foundation paper
 (optional see page 28)

Cutting -

Dimensions include a 1/4" seam allowance.

 Cut 100: 3" squares, assorted prints, plaids, and stripes

From each brown print:

NOTE: Separate each group of 8 strips into 2 piles of 4.

- Cut 8: 3/4" x 4 1/2" strips
- Cut 8: 3/4" x 4" strips
- Cut 8: 3/4" x 3 1/2" strips

From the muslin:

- Cut 180: 1 1/2" x 4 1/2" strips
- Cut 200: 3/4" x 4" strips
- Cut 200: 3/4" x 3 1/2" strips
- Cut 200: 3/4" x 3" strips

From the assorted black prints:

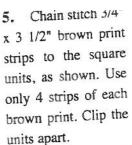
Cut 81: 1 1/2" squares

Also:

- Cut 4: 3 1/4" x 58" strips,
 black stripe, for the border
- Cut 6: 2 1/2" x 40" strips,
 black print, for the binding

Directions

- 1. Stitch a 3/4" x 3" muslin strip to a 3" print square. Chain stitch a 3/4" x 3" muslin strip to each of the remaining 3" squares.
- Clip the units apart.
- 3. Chain stitch 3/4" x 3" muslin strips to the opposite side of each square.
- 4. Clip the units apart and press the seam allowances toward the muslin. Trim the seam allowances to 3/16".





6. Chain stitch 3/4" x 3 1/2" matching brown print strips to the opposite side of each unit.



- 7. Clip the units apart and press the seam allowances toward the brown print. Trim the seam allowances to 3/16".
- 8. Chain stitch 3/4" x 3 1/2" muslin strips to the muslin sides of each unit. Press and trim, as before.
- 9. Chain stitch 3/4" x 4" matching brown print strips to each unit. Press and trim.

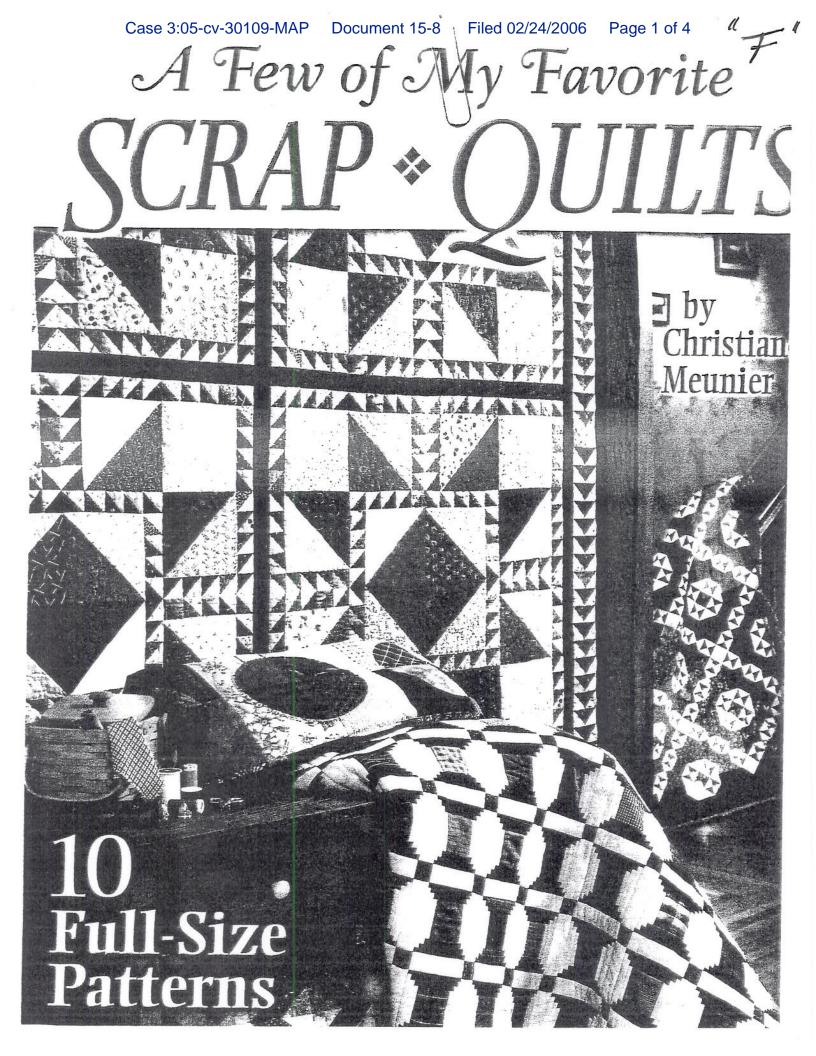


- 10. Chain stitch the 3/4" x 4" muslin strips to the muslin sides of each unit. Press and trim.
- 11. Chain stitch the 3/4" x 4 1/2" matching brown print strips to the remaining sides. Press and trim.



October/November 2003

Quill Works Today



❖ Introduction ❖

hile looking through past issues of Quilting Today and Traditional Quiltworks magazines for inspiration,

I noticed that it is always the same quilts that jump out at me. They are the quilts I loved when we first chose them to be in the magazine, and years later, all I need is to flip through the pages and catch a glimpse of them to fall in love with them again. Usually they're scrap quilts. I enjoy making scrap quilts as much as I do looking at them.

Scrap quilts originally were a tribute to our ancestors' ability to turn scarcity into beauty. They transformed their lack of material into a glorious celebration of life. With the wealth of fabric available today, scrap quilts can be more expressive than ever. Using lots of different fabrics can give quilts a visual depth and range of texture that is more difficult to attain with fewer fabrics. "Myths of Avalon," one of the patterns in this book, wouldn't be quite as interesting if it were a red and white quilt. But as it's shown here, your eyes travel around the surface of the quilt, resting in a certain area and studying others. It's a wonder that so many different elements can come together as a beautiful and harmonious unit.

Scrap quilts are also a lot of fun to make. As long as you have fabric in your stash, you never have to worry about running out of a particular one late at night. And if your stash is like mine, you're home free for the rest of your life! Working with a lot of differen fabrics gives you the freedom to be daring and to us

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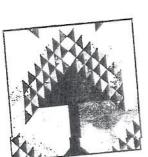
A few of my tavorite scrap quitts / by Christiane Meunier. Meunier, Christiane. p.cm. ISBN 1-885588-58-5 (pbk)

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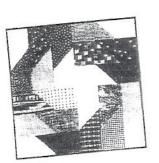
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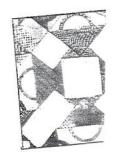


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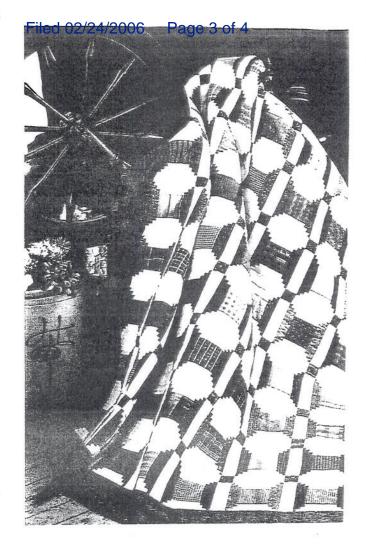
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ent use a little bit of that lime green that is so "not you." Scrap quilts are also very forgiving; you don't have to have the perfect plan when starting out. If your design gets too bright, just start making more dark blocks. If it gets too dull, step up on the brights. As you go through the process of making a block or two at a time, there's usually time to balance things out. And you never get stuck having to make 32 more blocks exactly like the 16 you just made!

The 10 quilts in this book are a few of my favorite scrap quilts. I hope they inspire you to get your fabric out and start playing!

Happy quilting!



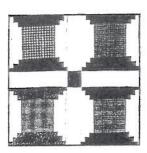




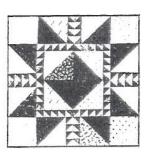
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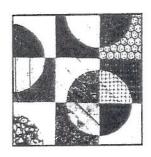
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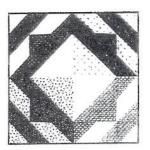
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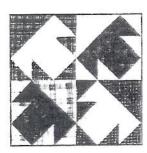
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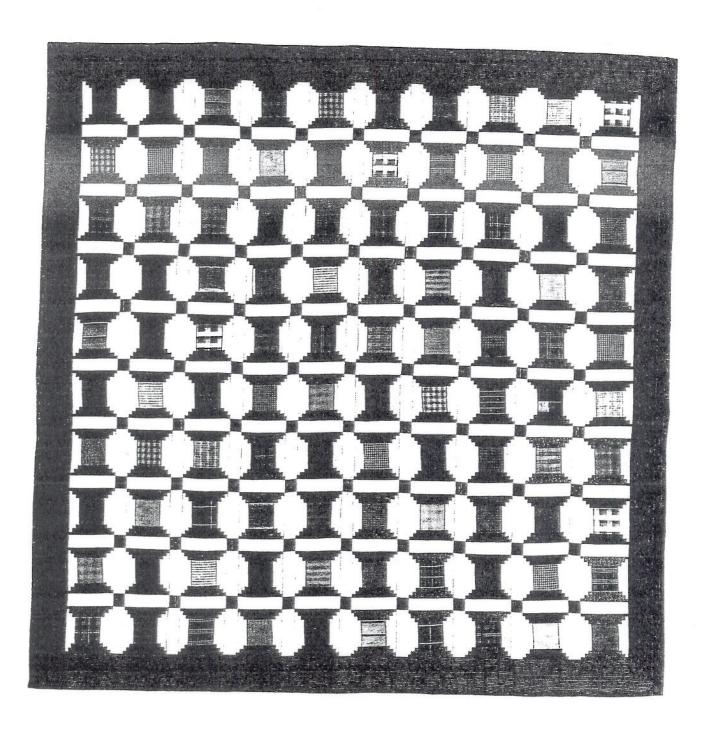
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Just Spooling Around

Sandra Touchette Talbot of Longmeadow, Massachusetts, loves making scrap quilts. She used lots of plaid and stripe fabrics when creating "Just Spooling Around." Sandra says her plan was to make a wallhanging but she had so much fun making the blocks that it turned into a "quilt of 100 spools."

The quilt was expertly machine quilted by Janis Austin Gilbert.







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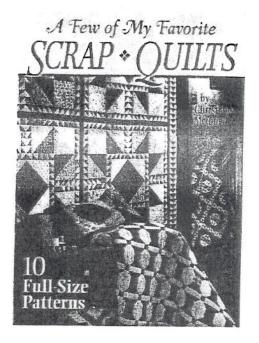
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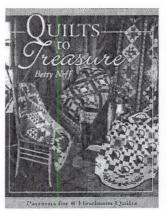
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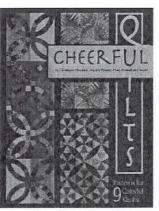
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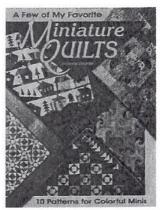
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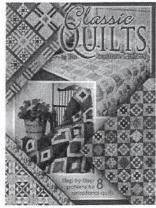
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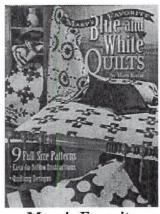
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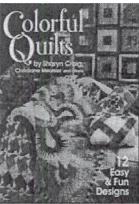
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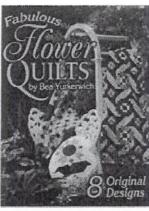
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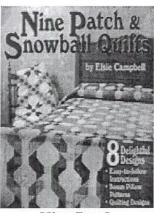
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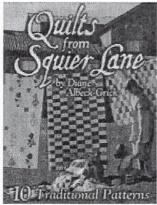
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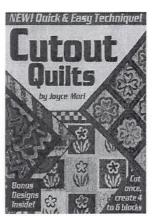
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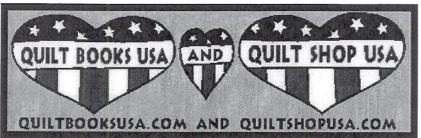
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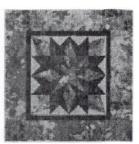


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Quilt Artistry, Inspired Designs from the East, door Yoshiko Jinzenji. Uitgever: Kodansha. Mooi Japans boek met volop foto's om inspiratie op te doen. Veel intensief machinaal quiltwerk op naturelkleurige handgeverfde stoffen en quilts die doen denken aan oude oosterse tapijten. 128 blz. ISBN: 4-7700-2756-7, prijs ca. € 35,--

Focus on Batiks door Jan Bode Smiley. Uitgever: C & T. Originele batik stoffen hebben een heel eigen uitstraling. Ook in combinatie met handgeverfde en met 'gewone' stoffen geven ze net iets extra's. ISBN: 1-57120-230-7, prijs ca. € 27,-

Star-Studded Quilts door Roxanne Carter. Uitgever: Martingale. De mogelijkheden met deze sterrenblokken zijn eindeloos. Alles met driehoeken en vierkanten, met instructies voor een snelle snij- en naaitechniek. Leuk voor een sampler, maar een kleiner werkje kan ook. 64 blz. ISBN: 1-56477-538-0, prijs ca. € 24,--

Blühende Quilts door Ula Lenz. Uitgever: Bergtor Verlag. Duits boek (Engelse tekst op website www.lenzula.com) met nieuwe patronen met bloemen en planten en wat je verder in de tuin vindt, alles voor paper piecing. 96 blz. ISBN: 3-9806815-8-0, prijs ca. € 22,--

Photo Fun door Cyndy Lyle Rymer. Uitgever: C & T. Afdrukken van foto's door printer of scanner op stof openen nieuwe perspectieven voor heel persoonlijke quilts. Ook leuk om zo een heel eigen etiket te maken. 64 blz. ISBN: 1-57120-276-5, prijs ca. € 19,--

A Few of My Favorite Scrap Quilts door Christiane Meunier. Uitgever: Chitra. Veel van deze patronen zijn eerder gepubliceerd in Quilting Today en Traditional

Quilt Savvy, Fallert's Guide to Images on Fabric door Caryl Bryer Fallert. Uitgever: AQS. U kunt uw eigen stoffen bedrukken met afbeeldingen die u zelf op uw

Sensational Settings door Joan Hanson. Uitgever: Martingale. Er zijn meer mogelijkheden om van een stapel blokken een quilt samen te stellen dan op het

Quiltworks. Scrap quilts zijn altijd aantrekkelijk omdat er zoveel verschillende stofjes in verwerkt kunnen worden en je niet meteen rolletjes of halve meters nodig hebt. 32 blz. ISBN: 1-885588-58-5, prijs ca. € 18,--

inkjetprinter heeft geprint en misschien wel zelf ontworpen. Ook foto's kunt u zo afdrukken op stof. Door speciale vloeistoffen (Bubble Jet Set en Bubble Jet Rinse) worden de afbeeldingen onuitwasbaar. 126 blz. in een ringbandje, ISBN: 1-57432-842-5, prijs ca. € 26,--

eerste gezicht lijkt.
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Tips om blokken van ongelijke grootte samen te voegen. 80 blz. ISBN:
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Borders, Bindings & Edges, The Art of Finishing Your Quilt door Sally Collins. Uitgever: C & T. Goede suggesties voor medaillonquilts, waarbij vanuit het centrumblok rand na rand wordt toegevoegd. Veel aandacht voor de afwerking, bv. met koord, schulpjes e.d. 112 blz. ISBN: 1-57120-233-1, prijs ca. € 30,--

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Uitgever: Martingale.
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From the Cover,

samengesteld door Mary Leman Austin en Quilter's Newsletter Magazine. Uitgever: C&T. Alle quilts hebben op de voorkant van QNM gestaan. Van 15 stuks is er een uitgebreide werkbeschrijving. 112 blz. ISBN: 1-57120-246-3, prijs ca. € 34,--

More Nickel Quilts door Pat Speth. Uitgever: Martingale. 20 patronen voor quilts, alle gemaakt met vierkante lapjes van 13 x 13 cm. Hoe meer verschillende hoe beter en ruilen mag. 112 blz. ISBN:



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was en die veel belangstelling
had. Een boek om eens rustig
mee te gaan zitten, want dit
zijn werkelijk topstukken.

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